

EXHIBIT 2

From: David Deal
To: [Weir, Thomas P.](#)
Cc: [Kustina, Emily M.](#); [Brown, Judson](#); [Weeks, Paul J.](#)
Subject: Re: Brammer v. Violent Hues
Date: Thursday, March 1, 2018 3:07:18 PM

Tom,

We will be filing an objection to your deposition requests. I am afraid you (not your client) have taken the opportunity to turn this case into your own personal litigation practice session.

I will leave it up to you to explain to the court the need to force my client and his wife to travel to Virginia in order to answer a few questions, especially considering we have made an offer of \$1,800.00 to settle the case.

Good luck with your approach.

On March 1, 2018 at 2:33 PM "Weir, Thomas P." <tom.weir@kirkland.com> wrote:

David,

Attached please find a deposition notice for Mr. Brammer. We also intend to take the deposition of Mr. Brammer's wife; will you accept service on her behalf so that she does not have to be formally served with a deposition subpoena? If not, please have Mr. Brammer let her know that the subpoena is coming so it is not a surprise.

Thanks,

Tom

Thomas P. Weir

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David

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